

National Republican Senatorial Committee

SENATOR RICH FRIST, M.D.
CHAIRMAN

MITCH BAINWAL
EXECUTIVE DIRECTOR

CLERK OF THE SENATE
62 JUL 19 10 41 03
H.A.

June 19, 2002

Mr. Andrew Dodson
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Reference: C00027466
October Monthly Report (9/1/01-9/30/01)

Dear Mr. Dodson:

- A. The contribution transfer from the federal to non-federal account marked Transfer/Lowell J. Burnett was made for at the request of the donor. No further clarification is required.
- B. The NRSC itemizes all credit card ultimate vendors to which the payment is over \$200 in calendar year in a memo entry and provides the name and address of those vendors. 11 CFR 104.10 requires only that committees disclose each disbursement from its federal or separate allocation account in payment for a joint federal and non-federal expense or activity. The cite in question does not mention memo entry credit card transactions. Those expenditures listed as unitemized are disbursements to vendors which are under the \$200 threshold for reporting ultimate vendors, as is directed in CFR 102.9(b)(2) and 104.9. We feel that we are in compliance with the regulations by continuing to follow these procedures.

Sincerely,



D. Jan McBride
Assistant Treasurer

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

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